

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

MICHELLE C. THOMPSON,

Plaintiff,

V.

**BLOCKBUSTER, INC., and  
JAY WELLS, individually.**

Defendants.

Docket No. 04-12301-RGS

**JOINT STATEMENT SUBMITTED PURSUANT TO  
FED. R. CIV. P. 26(f) AND LOCAL RULE 16.1**

**B. Proposed Agenda for Scheduling Conference**

The parties jointly propose that the agenda for the May 16, 2005 scheduling conference include a discussion of the following topics:

1. Proposed discovery and expert discovery plan;
2. Proposed schedule for filing of motions, including dispositive motions;
3. Hearing dates for potential motions;
4. Proposed trial date;
5. Possible mediation; and
6. Settlement/alternative dispute resolution

**C. Proposed Discovery Plan**

The parties jointly propose that discovery be conducted pursuant to the limits set forth in Local Rule 26.1(c) and take place in accordance with the following schedule.

<b><u>Event</u></b>	<b><u>Date</u></b>
Initial Disclosures and Document Exchange	served by June 30, 2005
Amendments to Pleadings Joinder of Additional Parties	July 15, 2005
Document requests	served by October 15, 2005
Interrogatories	served by October 15, 2005
Plaintiff's Expert Reports as required Fed. R. Civ. P. 26(a)(2)	served by November 15, 2005
Depositions of fact witnesses (including document subpoena)	completed by January 15, 2006
Defendants' Expert Reports as required Fed. R. Civ. P. 26(a)(2)	served by January 15, 2006
Depositions of expert witnesses	completed by February 15, 2006
All other discovery	completed by February 15, 2006

**D. Motions**

All dispositive motions to be filed no later than March 15, 2006. All oppositions to any dispositive motions to be filed no later than April 15, 2006.

**E. Certifications**

The certifications required by Local Rule 16.1(D)(3) will be filed separately on or before the day of the conference.


**F. Mediation and Trial by Magistrate**

The parties agree to consider mediation on an ongoing basis as an option for the resolution of this matter. At this time, the parties do not consent to trial before a United States Magistrate Judge.

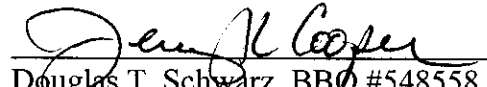
Respectfully submitted,

**LAW OFFICES OF JAMES G. GILBERT**

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